

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER, et al.,

Defendants.

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: 11 Civ. 0691 (LAK)
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: **Stipulation and [Proposed] Order**
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WHEREAS, Gary Greenberg (“Greenberg”) failed to appear for his properly noticed deposition on October 21, 2019;

WHEREAS, Greenberg also failed to appear for his properly noticed deposition on October 24, 2019;

WHEREAS, Greenberg has represented to Plaintiff Chevron Corporation (“Chevron”) that he will appear for his deposition on December 9, 2019;

WHEREAS, Greenberg is in possession of documents responsive to subpoenas served on him by Chevron that he has not produced to Chevron, including but not limited to a declaration Greenberg recently signed for counsel for Steven Donziger that was mentioned in Donziger’s attorney discipline proceedings on October 28, 2019;

WHEREAS, the parties seek to avoid the need for motion practice regarding Greenberg’s deposition and production of documents;

IT IS HEREBY STIPULATED AND AGREED between the undersigned parties:

1. Greenberg shall produce all documents responsive to Chevron’s subpoenas that are within his possession, custody, or control on a rolling basis, beginning as of the date of this stipulation, and shall produce all such documents by no later than December 7, 2019.

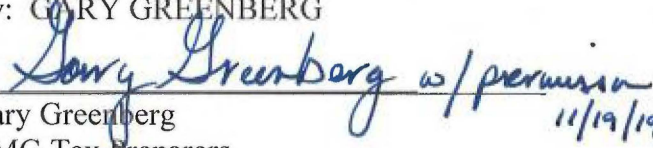
2. Greenberg shall appear for his deposition on December 9, 2019 at 2:00 PM at Gibson, Dunn & Crutcher LLP, 200 Park Ave., New York, NY 10166.

Dated: November 19, 2019

By: GIBSON, DUNN & CRUTCHER LLP


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By: GARY GREENBERG


Gary Greenberg
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11/19/19

IT IS SO ORDERED.

Dated: _____

HON. LEWIS KAPLAN, U.S.D.J.